

Exhibit F

1 UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
2 CHARLESTON DIVISION

3 *****

4 IN RE: ETHICON, INC. PELVIC Master File No.
REPAIR SYSTEM PRODUCTS 2:12-MD-02327
5 LIABILITY LITIGATION

MDL No. 2327

6 *****

7 This Document Relates to JOSEPH R. GOODWIN
Plaintiff: U.S. DISTRICT JUDGE

8

Barbara Kaiser

9 Case No. 2:12-cv-00887

10 *****

11

12

13 DEPOSITION OF MARIA A. ABADI, MD

14

15 Thursday, March 31st, 2016

16 10:27 a.m.

17

18 Held At:

19 Butler Snow

20 1700 Broadway

21 New York, New York

22

23

24 REPORTED BY:

25 Maureen O'Connor Pollard, RMR, CLR, CSR

1 you know, the status of the epithelium in the
2 bladder. But, you know, in this case there was
3 no submission of anything from the bladder, so
4 there is no way to assess any urinary symptoms
5 pertaining to these tissues.

6 Q. There are no histological findings in
7 any of the slides or specimen that would allow a
8 pathologist to draw that conclusion?

9 A. Correct, there is no way to correlate
10 urinary symptoms with anything that we find in
11 these tissues.

12 MR. COMBS: Dr. Abadi, thank you.

13 Tom, that is all the questions that I
14 have.

15 Do you have redirect?

16 MR. PLOUFF: I do.

17 REDIRECT EXAMINATION

18 BY MR. PLOUFF:

19 Q. Doctor, there were two areas that I
20 heard on the issue of methodology. One had to
21 do with the methodology used to determine the
22 orientation of the mesh to -- let's see, it had
23 to do with the -- whether the mesh was folded in
24 the tissue, is that right, or how you'd have to
25 be able -- what kind of -- what the surgeon

1 would have to do to tell you that?

2 A. Yeah. In order to establish the
3 position of the mesh in the tissues, or even the
4 shape of the mesh in the tissues, then the
5 surgeon has to guide the pathologist in that
6 regard. Because when they excise the mesh --

7 Q. Okay.

8 A. Excuse me, I was trying to explain.
9 When you excise -- when the surgeons
10 excise the mesh they're pulling the mesh out.
11 So the way it comes folded, if it comes folded,
12 it has nothing to do with the way it was
13 positioned in vivo, because obviously they are
14 pulling, they're tugging, they are cutting with
15 scissors, they're cutting with cautery. So the
16 mesh is being subjected to a lot of
17 manipulation.

18 So if the surgeon is truly interested
19 in telling the pathologist, or it's important in
20 that sense to give that information to the
21 pathologist so the pathologist can put it
22 together, then the specimen has to come down in
23 a different way. It cannot come in three
24 regular pieces, and then you try to put Humpty
25 Dumpty together, it doesn't work that way.

1 The surgeon needs to give orientation,
2 he needs to position the mesh exactly how it was
3 in a cardboard designated correctly; otherwise,
4 everything that you do with that tissue, you
5 know, whatever orientation you give to it is
6 speculative, because you really don't know what
7 is right, what is left, how is it curved, is it
8 anterior, is it posterior. You understand what
9 I mean? It's all speculation.

10 Q. So you've now explained the
11 methodology that a pathologist would have to
12 follow to come to some conclusion about the
13 position of the mesh in the tissue or the shape
14 of the mesh, correct?

15 A. Correct, yes.

16 Q. All right. And you've also explained
17 a methodology for how to determine if the
18 urinary symptoms were related to the mesh, is
19 that correct?

20 A. Right. In a situation like this, you
21 can only tell what, you know, what you see in
22 that mesh, but you cannot correlate it with
23 urinary symptoms.

24 Q. Okay. And did this methodology that
25 you're referring to, I mean, is this something

1 STATE OF NEW YORK)

2 COUNTY OF ERIE)

3 I, MAUREEN O'CONNOR POLLARD, RMR, CLR,
4 and Notary Public in and for the State of New
5 York, do certify that on the 31st day of March,
6 2016, at 10:27 o'clock, the person above-named
7 was duly sworn to testify to the truth of their
8 knowledge, and examined, and such examination
9 reduced to typewriting under my direction, and
10 is a true record of the testimony given by the
11 witness. I further certify that I am neither
12 attorney, related or employed by any of the
13 parties to this action, and that I am not a
14 relative or employee of any attorney employed by
15 the parties hereto, or financially interested in
16 the action.

17 In witness whereof, I have hereunto
18 set my hand this 3rd day of April, 2016.

19

20

21 _____
MAUREEN O. POLLARD, Notary Public

22 My Commission Expires: 3/14/19

23 Realtime Systems Administrator

24

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